82-123

Office - Supreme Court, U.S.
FILED
JUN 28 1982
ALEXANDER L. STEVAS,
CLERK

IN THE

SUPREME COURT OF THE UNITED STATES

October Term, 1981

NO. A-864

Annie Mary Timmons,

Petitioner

v.

Robert C. Andrews, D. Reese Williams,
William H. Tuller, Grover C. Kirby,
Charles H. Thomas, Joe E. Winter,
John T. Campbell and Graydon V. Olive,

Respondents

Petition for a Writ of Certiorari
To the United States Court of Appeals
For the Fourth Circuit

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The Petitioner petitions for a writ of Certiorari to the United States Court of Appeals for the Fourth

Circuit for review of that Courts' affirmation dated Dec. 24, 1981 of the judgment below and of the order of Jan. 27, 1982 denying Petition for Rehearing, thereby confirming demolition of all the Petitioner's valuable properties in the City of Columbia, S.C.

In accord with the Clerk of Courts instructions by telephone to correct her timely-submitted Petition damaged by a Copy Shop's faulty duplication of same the Petitioner does hereby amend her petition in an effort to meet the Clerk's requirements even though her Claim for Interlocutory

Injunction previously submitted to the Court would hold all Matters in Allegiance until adjudicated.

The Petitioner would appreciate the Courts consideration of the larger Appendix submitted with her Petition first in conjunction with this 2nd attempt. The larger Appendix Clarifies the case but cannot be authentically transferred to smaller pages without reducing the type against the rules. A small inadequate App. is included herewith. The Clerk retained 10 copies of my first petition for the Court. The 1st appendix is App. 1 and the 2nd APP 2.

Questions Presented

1 Can City Officials take over private properties by the sole means of Officially

denying the owner of all constitutional property rights and by violating all the laws in connection therewith without making a single legal or just move when all other citizens have to obey the laws?

2. Can private property be seized -

Without a complaint
without Notices
without a hearing
without evidence
without testimony
without evaluation
without a possible decision on "fitness or unfitness" of Bldgs for human habitation
without 120 days allowance for the correction of each defect

where all of these prerequesites listed as missing are absolutely necessary prior to the posting of any Bldgs with condemnation signs?

3. Should the Court affirm the illegal and criminal taking of private property where such affirmance would turn the law-breakers' heretofore-frowned-upon black path of criminal violations of rights and laws into a golden highway of shining success brilliantly lighted by the Court's undisturbed approval and constituting the most perfect cover-up for crime possible under the sun and the greatest protection for greedy criminals in position to use the public trust to satisfy their own selfish desires?

4. Should the Appellant be denied her right to Due Process of Law which would be afforded by the Completion of her Appeal?

5. Can an Official demolish properties acquired, built and operated as nonconforming with respect to the number of Units where all the laws repeatedly protect the nonconforming uses for the existence of the Bldgs?

6. Should the owner be denied her opportunity to complete her Appeal pending in the Court of Appeals because of a decision upon her Motion submitted for protection in a near-death emergency?

7. Is it not possible for the Appellant to have a fair Hearing in a just court where she has been deprived of one repeatedly by legal trickery and collusion?

8. Can affirmation of a decision to demolish remain firm where such decision on face value was made on the basis of false findings of fact and irrelevant inapplicable conclusions of law?

9. Can a law alleged as authority for the condemnation deprive a property owner of life, liberty, and property when that authority was not even adopted as a part of City Ord. until April 24, 1974 more than two and one-half years after illegal posting of condemnation signs ?

10. Can the decision allegedly based on

Ord. 103. 2 be allowed to stand where a part of that law makes the Rehab Official a Dictator and renders the Ord. with authorizing Statutes 31-15-30 and 31-15-70 as unconstitutional over-all?

11. Can a Decision based on an obviously erroneous transcript of testimony stand where Appellant's Motion for correction of same was denied and the transcript was to be used with pending appeal?

12. Should a decision remain affirmed when it was made in the face of Appellees' repeated admission of the guilt of failing to serve the Appellant a Complaint and Notices, to hold a hearing and make legal evaluation of "unfitness"?

13. Can affirmation of a decision be unreviewed when said affirmation itself expresses uncertainty and doubt as to just exactly what the Court is affirming in the words "or even if we consider the Motion for Summary Reversal" where that Motion with the answer to same would necessarily

be the proper material for the Court's consideration?

14. Can Appellees effect denial of Certiorari by publicizing spectacular creations of the condition of the Bldgs and if possible getting such reports to the Supreme Court by way of an influential politician in order to preclude any possible chance for a hearing where all such reports are false and constitute more schemes to avoid Court, to get rid of the owner and to get hold of the properties?

15. Can a local Judge's Order dated Apr. 30, 1982 restraining the Appellant from taking any action to interfere with demolition of the Bldgs or to take or haul anything away from the Bldgs at the end of June 26 bring about demolition of these Bldgs where the Order was signed nearly 2 months prior to due date for Petition for Writ and End of Stay or would his action and Order be invalid?

16. Is a local court order valid where one part of the order denies jurisdiction of that court and the rest restrains the owner-defendant from objecting to demolition?

17. Can a decision adverse to the Appellant stand undisturbed where there was no applicable evidence submitted by Appellees except one sentence which was proved false?

18. Can a Zoning Decision allowing 14 units in lieu the 72 units in use be valid where the decision is substantiated only by Or. 5-2.5, a simple well-stated one-sentence law cut in half to misrepresent the entire intent of the law?

19. Can a Zoning Decision be valid where the Court kept the appeal in an

abandoned State for 2½ years and then ruled that Court had no jurisdiction?

20. Can the Supreme Court affirm a decision that gives the green light to Officials for the continuation of obvious denial of a property owner's constitutional rights and violation of all applicable laws, by collusive and conspirational action where the highest Court has expressed definite repugnance for "Injurious" actions of Officials even tho said conduct be committed in good faith?

TABLE OF CONTENTS

	page
Opinions and Orders Below	11
Jurisdiction	11
Questions Presented	3-10
Constitutional Provisions involved	
U. S. Constitutional Amendments and Articles	
S. C. State Statutes	
City of Columbia, S. C. Ordinances	12; (42A-52 App.)
Statement	13-24
Reasons for Granting Writ	25-34
Conclusion	35
Appendix	
Court Orders and Opinions	
Excerpts from Petitioner's 361-page Motion on which Decision was made	
Appellees' Letter in Answer to Motion	
Other significant Documents	1-61

TABLE OF AUTHORITIES

page

Jurisdictional
U. S. C. Statutes (2)
1254 (1) and 2101 (c)

Instructional
16 Am. Jur. Section 364
Supreme Court Rules 17-21

Violated:
Amendments (9)
I, IV, V, VI, VII,
VIII, IX, XIII and XIV
Articles (4)
I Sec 1, I Sec 10,
III, Sec. 2 and VI

Local Laws Involved Herein
S. C. Statutes (2)
31-15-30
31-15-70
Columbia, City Ordinances (10)
5-2, 1, 5-2. 3, 5-2. 4,
5-2. 5, 5-2. 6, 5-3,
6-6. 2, 10-2 and 10-3
Building Code 103. 2

Opinions Below

The Opinion of the United States District Court for the District of South Carolina granting Respondents' Motion for Summary Affirmance is printed in the Appendix hereto (App.2 pp.9-20) and is followed by the Opinion of the Court of Appeals which affirmed the District Court (App.2pp.7-8).

JURISDICTION

The Decision of the Court of Appeals was made Dec. 24, 1981. Petitioner's Motion for Rehearing was decided Jan. 27, 1982. (The Order Denying Rehearing also grants a Stay of Mandate for 30 days and other Orders Stay the Mandate through Mar. 27, Apr. 16 (corrected by letter to read April 27) and June 26, 1982. Chief Justice Burger extended the time to file Petition for Writ of Certiorari to and including June 26, 1982 (App.2 p. 1).

The Jurisdiction of this Court is invoked under Title 28 USC Section 1254 (1) and 2101 (c).

Statutes Involved

Statutes involved being lengthy are cited at this point and printed verbatim in the Appendix.

The laws violated by Respondents are as follows:

United States Constitution.

Amendments

IV, V, VI, VII, VIII, XIII, and XIV

Articles of the Constitution

1 Sec 9, 1 Sec 10, 3 Sec 2, and 6

South Carolina State Statutes

31-15-30

31-15-70

City Ordinances

5-1, 5-2, 5-2.1, 5-2.3, 5-2.5, 5-2.6, 5-3, 6-6.2, 6-3, 10-2, 10-3.1, 103.2, and current 103.2 (a-3).

STATEMENT

The whole story of this Appellant and her properties has been and is a long bitter struggle for survival and property rights. The right to life, liberty, and property should mean happiness and not intolerable persecutive burdens. The Appellant filed this suit Dec. 31, 1974 seeking a declaratory judgment determining the unconstitutionality of the condemnation demolition action against her in 1971 both as to the unlawful manner of the taking of her property and the City Ordinance with State Statutes alleged to be the authority for same and petitioning for injunctive relief to prohibit demolition and to bring about issuance of permits for the repair of these Bldgs for the continuation of their legal non-conforming uses as rental units.

For 7 years the Respondents precluded a District Court hearing of the case by legal chicanery and unwarranted Motions to dismiss. During

those years the District Court dismissed the case twice and the Court of Appeals reversed the case twice and remanded it.

Finally on July 28, 1980 the District Court tolerated a hearing of a kind in which the rank unconstitutionality of the condemnation proceedings and the authorization for same was in the main ignored and avoided by Respondent and the Court. Appellant had to endure misrepresentation and derogatory remarks by counsel and the Court while it was she alone who presented the true facts and applicable laws. The District Court denied Appellant's request for relief on the ground that "the plaintiff has presented no evidence in which injunctive relief will lie" and judgment was entered for the Respondents.

The Court of Appeals settled Appellant's Motion and documentary evidence in 361 pages in 2 words "without merit" and affirmed the

District Court Judgment. The Decision also denies Petitioner's Motion with respect to the very erroneous transcript of testimony and states "Even if we consider the Motion for Summary Reversal" when Appellant's Motion and Respondents' Answer were the documents to be weighed and not the "Even if we consider the Motion" remark(App 24a)

The Appellant acquired title to the properties herein involved about the years 1940 - 1944. She used whatever part of the Bldgs standing on the properties at the time of purchase and of course built by far the greater part of them. If there was no Bldg she constructed one. Note the pictures of the Bldgs (App2p6a-6)some of them beautiful even after years of deliberate damages and deterioration from forced non repair and deterioration by heavy RAINFALL.

Appellant constructed these Bldgs in accordance with the City Code submitting plans in keeping with City requirements. She endured the hard struggle to construct the living units as planned because she was helping greatly with official approval to alleviate the ever-increasing critical housing shortage of the specific type of accommodations she was furnishing--comfortable, private, decent living units at reasonable prices for singles, couples or families not exceeding 3 in number serving in various types of business and govt work like Army Officers, soldier couples, students, teachers, nurses, etc.

The City fully approved plans for these bldgs and their non-conforming uses and rights from the day plans were submitted and construction begun until the Rehab dictator's sly posting of condemnation signs.

All Bldg Codes from passage of the original Ord. May 29, 1924 through the present Code are

protective of the existence and continuation of non-conforming uses as:

> Bldg Code 1933 Sec. 12:
> "A non-conforming existing use on May 29, 1924 may be continued..."
>
> Bldg Code Feb. 6, 1963 Sec. 230.02:
> "It is the intent of this Ord. to permit these non-conformlees to continue until they are removed..."
>
> Sec. 230.05 "No such structure may be enlarged or altered in a way which increases its nonconformity."
>
> Bldg. Ord. 1974 - Sec. 5-1:
> "It is the intent to of this Ord. to permit these non-conformitees to continue until they are removed..."

See City Ord. printed herein (App.) pages 28-31)

It took years to complete the originally-planned Bldg of 235 units on the lands acquired from about 1940--1945. But upon completion in lieu of the song of joy and achievement on the eve of fabulous long-deserved return came a dirge of a living death – lying propaganda, illegal acts, trickery, fraud, deception, violations of constitutional rights,

misunderstanding, and in the last stages of suffering poverty, crushing of hope and spirit, and the absence of all things that make life worthwhile.

Following completion the Bldgs were kept in excellent condition at all times, being serviced every day by workmen employed for the purpose. If anything needed repairing it was quickly and efficiently repaired. If anything needed replacing it was replaced .

The Appellant's serious highblood pressure condition necessitated employment of a property manager temporarily. When the plan to confiscate reached the illegal posting of condemnation signs there was nothing left but harassment, criticism, warning, tricks, physical attack, etc. He was prevented from doing his job but continued to do all he could spending more and more time trying to get contractors to find out what the condemning

official wanted done and to do it. His constant efforts and those of the owner, her attorneys, friends and acquaintances brought about more than 100 attempts to obtain permits to repair these sound bldgs forcibly made non-productive. All attempts were directly denied or turned aside. Contractors and workmen could not afford to lose jobs and favors altho many hated the wrong actions of officials. The telephone pages were followed each year in an effort to get a contractor who could obtain repair permits.

Appellant never gave up hope completely that somehow someone might actually succeed in capturing the privilege of paying for a permit to repair her Bldgs since issuing repair permits is a routine official duty easily handled in a few minutes time. It occurred to her that the regular refuser of permits in this case might be off duty some day when another fresh prospect was contacted to try for a permit again.

Time and space allow for only the mention of a few other examples of violations of rights and laws in this case.

1. With the knowledge that demolition bids were being mailed out, the owner on Dec. 31, 1974 filed the Complaint in the District Court.

2. During the agonizing 7-year period of stagnation in that Court the Appellant about Thanksgiving time in 1975 following an operation for cancer of the colon in Florida and upon advice of physicians not to travel for about 5 or 6 weeks more, did come to Columbia for a Court trial on a Complaint of an out-of-state con. man who, pretending to represent the owner, colluded with the City and State against her. While the jury was considering the case, the Rehab Official sent a deputy with 6 criminal warrants to arrest Timmons in the Courtroom waiting for a jury decision of a case unrelated to the City

case. Without even a misdemeanor she, hardly able to sit up, was arrested in the Courtroom with threats of being handcuffed and dragged out if she objected to the arrest made for some reason in connection with repair of her Bldgs. The lawyer on the case had walked out at the start of the trial and another lawyer managed to arrange bond with her money being held illegally by the Court. She was persecuted with notices for months but no hearing was ever held and no bond money ever returned (App. I p. 37-39). The jury probably saw her leave the court house and gave the con. man a sizable verdict when she couldn't get $1 from her own money for bread or medicine.

3. In Nov. 1976 owner was ordered personally to apply for repair permits and was illegally ordered to the zoning Dept. where applications were "fixed" to make it appear that zoning was a reason for the posting of signs in 1971 (App I 24-25) raise

information would establish their right. Even the leaflet of information in the office (App./p.). clearly stated "new construction" as the only concern of zoning. The zoning administrator admitted she could not repair large apt. bldgs into the number of units according to lot requirements and that she should purchase permits then to save her bldgs. She was promised a permit if she'd get a contractor's license. She got one in 15 minutes but no repair permits were issued. (App 2 pages 34 - 35; pp. 56-57)

4. In 1978 the owner was ordered to apply for repair permits again in person and again forced to zoning where she was told to appeal to Zoning Board or she would never get a permit. The Zoning Board Hearing was an outrageous fiasco and a disgrace to integrity (App./ p. 23-25). She appealed the Zoning Board decision to the Court of Common Pleas and the case was seemingly abandoned for several years (App 2 58 - 59)

5. At the close of 1980 and the beginning of 1981 near-death illness caused the zoning case

to be brought to life IN APPELLANT'S OPINION.

6. In early 1981 a case on the issue of permits (It had been filed by Appellant's lawyer in 1977) was rejuvinated, decided by the Supreme Court of S. C. and published in the newspapers denying her Appeal on permits in big headlines on demolition while appellant was under the knife in the hospital

7. In 1982 zoning was scheduled and Appellees disposed of it by bringing in a Special Appearance to object to jurisdiction. That was after it had been in Court nearly 3 years.

8. Jurisdiction case was scheduled and Appellees jumped to a Rule to Show Cause action.

9. Judge James E. Moore denied jurisdiction of the Court, calling that part of his Order zoning and then ruled against the Appellant-Defendant on the Rule to Show Cause order including the denial of jurisdiction, thereby INVALIDATING his own Order.

Since the illegal posting of condemnation signs in 1971 there has been no way to make a move except to demolish according to the unconstitutional law allegedly being followed and with unconstitutional actions against the owner in progress constantly.

The owner couldn't repair in the face of these conditions:

1. Consistent refusal of repair permits and without complaint.
2. Deliberate damages, planned arson and theft.
3. Unrestricted criminal actions against the owner.
4. Total disregard of Court injunctions prohibiting interference with these properties.
5. Judges or substitute judges signatures on court orders restraining the owner from making repairs.
6. All actions in connection with these properties or owner violative of rights and laws.
7. The raising of a hammer in repair a promised sign for instant arrest and jail sentence.

Appellees left nothing without ban open to Appellant except death.

Reasons for Granting Writ

1. Certiorari should be granted to allow the Court to unseat the newly-established precedent endorsing wholesale confiscation of properties through the "sole" method of violating constitutional rights and laws 100% without the requirement or need for a single legal act throughout the taking procedure and litigation.

The danger of turning a black path of criminal violations of constitutional rights into a brilliantly lighted golden highway of success creates a highly-dangerous situation that has never before been considered in such scope and demands settlement by this Court in order to break through the cover-up of deliberate schemes for confiscation under guise of law and immunity which at this point is made far more powerful by the affirmation of the Appeals Court.

2. Certiorari should be granted in order to remove Judicial Approval from the misuse of public trust for the purpose of confiscation of private property at a cost to the citizen of her life, liberty, and property and at the cost of a higher risk of losing these things to all others.

3. Certiorari should be granted because without it this petitioner will have lost all without ever having been heard in a fair Court of Justice and therefore without the protection afforded by Due Process of Law, thereby creating a departure so far from the accepted course of judicial proceedings as to call for this Court's supervision.

4. Certiorari should be granted to settle the unconstitutionality of Enactments used in this condemnation process that are designed for the creation of a Dictatorship.

5. Certiorari should be granted in order that consideration of the Appellant's evidence and

proof be given by a fair Court of Justice in view of the fact that Appellees have won every bout in Court without submitting any applicable evidence at all except one sentence which was proved false in Court, while the Appellant has submitted many pages with substantiating documents in proof of her case.

That one line reads as follows and comes from an affidavit by Rehab Official Joe Winter in 1974, the only applicable evidence ever given in--"Complaints were sent to plaintiff by registered mail but returned to the Urban Rehabilitation unopened" (p.63 App. 1 before Correction and p169 full copy of case; and App 2 p55

6 Certiorari should be granted to settle the issue of precedency between an Appeal pending in the United States Court of Appeals and a motion interjected for extreme emergency reasons with the right reserved to complete the Appeal and get a final decision should the Appellant live. This may be a remote issue applicable to one of many cases but should be settled by this Court.

Note: It should be explained here and now that the Decision sought to be reviewed was made specifically on Petitioner's Motion for Stay of Demolition called by the Court of Appeals a Motion for Summary Reversal and interjected into the case by the Petitioner during her pending appeal in an effort to prohibit demolition of her Bldgs quickly in the face of small hope given for her life and in the hope that someone might finish her Appeal. Now having been denied the opportunity to finish her Appeal because of the Court's affirmation of demolition of her properties in lieu of allowing her to exercise her right to be fully heard through briefs,

supplementary information, hearing, rehearing, Argument, and possible unforeseen opportunities to submit further evidence by Court Order for same, the Petitioner has no course open except to seek Justice by Petition for Writ of Certiorari. Her letter of transmittal with her Motion for SUMMARY Reversal explain her belief in Appeal under the circumstances (App p. 57). SINCE THEN She has Submitted her DECLARATION AND CLAIM of JUNE 25, 1982 which would now hold her Petition for Cert. IN ABEYANCE. However, She proceeds with An TIMELY PETITION for WRIT!

The course of Certiorari appears to be a favorable opportunity for justice since the Court is aware that the Decision in question was made on Petitioner's Motion to prohibit demolition called motion for SUMMARY Reversal submitted under urgent AND and justifiable circumstances while her appeal WAS is still uncompleted.

The Supreme Court vested with the power to administer justice as it sees fit by reversal, modification, review, completion of Appeal, New Trial or a mere declaration of what is right and of that which is unconstitutional can issue such Orders

as would protect the owner against further denial of Due Process of Law in the destruction of properties and prevention of repairs to the damages done to them after illegal take-over by Official in 1971 under guise of law with the full protection they believe to be afforded by undisputed immunity. Such denial of Due Process of Law has created the Questions Presented already (App 2 pp 2-9) for consideration by the Court.

Petitioner has submitted proof of every line she has written in her Motion for Stay of Demolition called by the Court "Motion for Summary Reversal" which is the document upon which the Court of Appeals decision was rendered.

Within the limits of Certiorari it is possible only to mention a few more reasons why Certiorari should be granted to settle the following issues:

7. Whether a false substantiation for an illegal action created 7 years after commission of same can stand.

8. Whether an affirmed decision can remain unreviewed when confirming condemnation action substantiated only by a law not even adopted until 2½ years after the illegal condemnation.

9. Whether an affirmation based on the stated uncertainty of the Appeals

Court as to what that Court is deciding upon can be allowed to stand.

10. Whether a decision can remain unreviewed when the alleged authority for the action being decided creates a perfect dictatorship in complete violation of the Constitution of the United States.

11. Whether an affirmation based on a decision adverse to one party can be upheld despite the opposing party's admission of guilt.

12. Whether property can be confiscated by means of law distorted by Respondents to Misrepresent the entire meaning

and intent of the law.

13. Whether the Court will accept spectacular false publicity in lieu of Court consideration.

14. Whether deliberately-schemed collusive action against a citizen and property owner can be denied review when this Honorable Court has already frowned upon "injurious" action by officials even where said conduct is committed in good faith.

Certiorari must be granted because the Court of Appeals has affirmed wholesale denial of constitutional rights and violations of property laws in conflict with Applicable rulings of the Supreme Court.

The Supreme Court in the voice of Justice Brennan gave clear and powerful support to the Constitution of the United States in these words:

"The knowledge that a municipality will be liable for all of its injurious conduct whether committed in good

> faith or not should create an incentive for Officials who may harbor doubts about the lawfulness of their intended actions to err on the side of protecting citizens' constitutional rights.
> "Furthermore, the threat that damages might be levied against the City may encourage those in policy making positions to institute internal rules and programs designed to minimize the likelihood of unintentionable infringements on constitutional rights."
> (Owne v. City of Independence, 445US622 63 L Ed 2d673, 100 S. Ct 1398).

Justice Brennan feels and frowns upon injustice and hurt suffered by a citizen and tries to protect him even from unintentional infrigements of constitutional rights.

There is not the slightest possibility that this Court will let stand a decision affirming flagrant planned undisputed violations of rights and laws, the first of which reduced the owner's life to a veritable hell-on-earth existence of involuntary servitude, a condition of forced stale-mate, deprived of all things and given a heart as heavy as lead kept moving only by the golden thread of hope that her constitutional rights might be upheld by this Court.

CONCLUSION

For all the foregoing reasons and in view of the fact that every word stated herein is proved by the 361 page motion now before this Court for consideration plus 1000's more pages already filed,

Petitioner prays that the court will grant her Petition for Writ of Certiorari or make whatever decision it takes to uphold constitutional and God-given rights to life, liberty and Justice.

Respectfully submitted,

Annie Mary Timmons
Pro Se

AFFIDAVIT OF SERVICE

The undersigned hereby certifies that required Petition for Writ of Certiorari corrected as per Court instruction was served on Robert G. Cooper, Esquire by depositing same in the United States Mail, postage prepaid, on the 17th day of July, 1982 addressed to:

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Annie Mary Timmons
Annie Mary Timmons
Pro Se
3104 Monroe Street
Columbia, S. C. 29205

July 17, 1982

SWORN TO before me this
_____ day of July 1982.

Sidelle D. Ott
Sidelle D. Ott, Notary Public for South Carolina
My commission expires March 9, 1991.